

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MISSOURI PRIMATE FOUNDATION et al.,

Plaintiffs and Counterclaim
Defendants,

v.

Case No.: 4:16-cv-02163

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC. et al.,**

Defendants and Counterclaim
Plaintiffs.

**CONSENT MOTION FOR EXTENSION OF TIME
AND INCORPORATED MEMORANDUM OF LAW**

Pursuant to Local Rules 1.05 and 4.01, Defendants People for the Ethical Treatment of Animals, Inc. and Angela Scott (collectively “Counterclaim Plaintiffs”) hereby move for an Order extending the time by which they must file their response(s) to Counterclaim Defendants’ Motion to Dismiss [ECF Nos. 29, 30] and Motion to Strike [ECF Nos. 27, 28], up to and including August 7, 2017, based upon the following:

1. Counterclaim Plaintiffs filed their Answer to Count I and Counterclaim on June 23, 2017. [ECF No. 23.]

2. On July 13, 2017, after receiving Counterclaim Plaintiffs’ consent to an extension, Counterclaim Defendants filed a stipulated order to extend the deadline for its response to the Counterclaim. [ECF No. 25.] The Court interpreted the filing as a motion for extension of time and granted it. [ECF No. 26.]

3. On July 20, 2017, Counterclaim Defendants filed a motion to strike certain paragraphs of the Counterclaim [ECF Nos. 27, 28], a motion to dismiss [ECF Nos. 29, 30], and an answer [ECF No. 31].

4. Pursuant to Local Rule 4.01(A), Counterclaim Plaintiffs' deadline to respond to both motions is July 27, 2017.

5. Pursuant to Local Rule 1.05, this Court is authorized and has the discretion to extend the period for any such filing.

6. Due to the scheduling of the attorneys working on this matter, including international travel, and that Counterclaim Defendants simultaneously filed their answer, Counterclaim Plaintiffs require additional time to assess and respond to the items contained in the motions. Plaintiffs respectfully submit that this demonstrates good cause for the ten-day enlargement of time sought.

7. On July 21, 2017, the undersigned conferred with counsel for Counterclaim Defendants, who stated that Counterclaim Defendants consent to this motion.

Date: July 24, 2017

Respectfully submitted,

By: /s/ Jared S. Goodman
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CERTIFICATE OF SERVICE

I hereby certify that on **July 24, 2017**, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, by which notification of such filing was electronically sent and served to the following:

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